

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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In Re:

LTL MANAGEMENT LLC,

Debtor.

Chapter 11

Case No. 21-30589 (MBK)

**SUPPLEMENTAL ORDER GRANTING LIMITED RELIEF FROM THE AUTOMATIC
STAY**

The relief on the following pages, numbered two (2) and (3), is hereby **ORDERED**.

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Debtors: LTL Management LLC

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Caption of Order: **ORDER GRANTING FURTHER RELIEF FROM THE AUTOMATIC STAY**

THIS MATTER having been opened to the Court by Anthony Hernandez Valadez (“Movant”), by and through his counsel, the law firm of Kazan, McClain, Satterley & Greenwood, A Professional Law Corporation, and local counsel Saiber LLC, for the entry of an order supplementing the Order Granting Limited Relief from the Automatic Stay filed on August 8, 2022 (“Lift-Stay Order”) [Dkt. 2836] as to non-debtors Johnson & Johnson, Johnson & Johnson Consumer Inc., Albertsons Companies, Inc., Lucky Stores, Inc., Safeway Inc., Save Mart Supermarkets, Target Corporation, and Walmart Inc. (collectively, the “Protected Parties”); the Court having considered the papers submitted on behalf of Movant and the Protected Parties; having heard the statements of counsel at the hearing held on September 14, 2022; and for good cause shown;

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that the Lift-Stay Order is supplemented as follows:

1. Movant and the Protected Parties be and hereby are granted further relief from the automatic stay and the Preliminary Injunction to conduct the discovery necessary for the parties to be prepared for trial in the Superior Court of California, County of Alameda (“State Court”), on November 7, 2022, in the event the Third Circuit Court of Appeals reverses this Court’s orders enjoining and prohibiting Movant from prosecuting his claims against Debtor and the Protected Parties.

2. Pursuant to the State Court’s request for deadlines on discovery and other related matters, this Court orders the following:

a. All fact and expert discovery must be completed by October 31, 2022;

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b. Parties are deemed to have demanded an exchange of expert witnesses and discoverable writings [Cal. Code Civ. Proc. § 2034.210, et seq.];

c. Parties must designate their expert witnesses and those witnesses' discoverable writings [Cal. Code Civ. Proc. § 2034.270] by no later than October 24, 2022;

d. The designating party shall "offer up" the expert(s) for deposition within a reasonable time before discovery closes;

e. Any party unilaterally canceling an accepted deposition will be responsible for re-calendarar the deposition within a reasonable time before discovery closes;

f. The parties are to meet and confer as necessary about a protocol for handling pathology evidence, including any destructive testing; and

g. All parties must respond within 14 days to written discovery (unless otherwise agreed to).

3. The stay set forth in Rule 4001(a)(3) of the Federal Rules of Bankruptcy Procedure shall not apply to this Order, and the Order shall be effective immediately.

4. The Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order's implementation, interpretation, and/or enforcement, including with respect to the scope of the relief granted by this Order.